

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

LESLIE WILSON,	:	No. 02-CV-4662
	:	
Plaintiff	:	
	:	JURY TRIAL DEMANDED
v.	:	
	:	
	:	JUDGE BRUCE W. KAUFFMAN
PPL ELECTRIC UTILITIES	:	
CORPORATION,	:	
	:	
Defendant	:	

**MOTION FOR ENLARGEMENT
OF TIME TO COMPLETE DISCOVERY**

Plaintiff Leslie Wilson, by and through his attorney, GLENNIS L. CLARK, ESQUIRE, hereby respectfully moves this Honorable court for an extension of time within which to complete discovery. In support of this Motion, Plaintiff represents the following:

1. Pursuant to Scheduling Order dated December 3, 2002, all discovery was to be completed by June 2, 2003.
2. On or about September 20, 2002 Defendant served Plaintiff with Interrogatories and Request for Production of Documents.

3. On or about November 12, 2002, Plaintiff served Defendant with Plaintiff's Discovery Disclosure Pursuant to Rule 26(a).

4. On or about January 22, 2003, Defendants served Plaintiff with Defendant's Rule 26(a)(1) Disclosure.

5. On or about March 13, 2003, Plaintiff served said responses to Defendants Interrogatories and Document Requests.

6. Counsel has been delayed in addressing Defendants' Interrogatories and Request for Production of Document because of other pressing legal matters, including a Brief in the Middle District of Pennsylvania and surgery and recuperation in February.

7. On or about March 27, 2003, Plaintiff served Defendant with Plaintiff's Request for Production of Documents.

8. Responses have not yet been received.

9. The parties agreed to conduct plaintiff's deposition on April 18, 2003. Subsequently, the defendant asked to move the date of the deposition because it had been scheduled on Good Friday.

10. The parties rescheduled plaintiff's deposition to take place on April 28 and April 29, 2003.

11. Counsel for Defendant has no objection to this motion.

WHEREFORE, Plaintiff respectfully requests an additional thirty (30) days, up to and including July 2, 2003, to complete discovery and that all other deadlines in this Court's December 3, 2002 Order be enlarged by thirty (30) days.

Respectfully submitted:

GLENNIS L. CLARK
I. D. No. 36682
Attorney for Plaintiff
LAW OFFICE OF GLENNIS L. CLARK
532 Walnut Street
Allentown, PA 18101
610-433-6624

Dated: _____

CERTIFICATE OF SERVICE

I, Glennis L. Clark, Esquire, hereby certify that I have caused to be served a true and correct copy of the motion for enlargement of time to complete discovery via first class mail, postage prepaid on the date stated below to the offices of:

Peter P. Rahbar, Esquire
Proskauer Rose, LLP
1585 Broadway
New York, NY 10036

Dated: _____

GLENNIS L. CLARK
I. D. No. 36682
Attorney for Plaintiff
LAW OFFICE OF GLENNIS L. CLARK
532 Walnut Street
Allentown, PA 18101
610-433-6624

CERTIFICATE OF CONCURRENCE

I, Glennis L. Clark, certify that I contacted Defendant's counsel, Peter P. Rahbar, Esquire, and he concurs with the within Motion for Enlargement of Time.

Dated: _____

GLENNIS L. CLARK
I. D. No. 36682
Attorney for Plaintiff
LAW OFFICE OF GLENNIS L. CLARK
532 Walnut Street
Allentown, PA 18101
610-433-6624